

**REMARKS:**

This paper is herewith filed in response to the Examiner's final Office Action mailed on February 20, 2009 for the above-captioned U.S. Patent Application. This office action is a final rejection of claims 1-29 of the application.

More specifically, the Examiner has rejected claims 1-2, 4-7, and 12-29 under 35 USC 103(a) as being unpatentable over Astala (US6,590,568) in view of Cheng-Hung (US6,397,232); rejected claim 3 under 35 USC 103(a) as being unpatentable over Astala in view of Cheng-Hung and further in view of Hawkins (US6,781,575); and rejected claims 8-11 under 35 USC 103(a) as being unpatentable over Astala in view of Cheng-Hung (US6,397,232 and further in view of Leavitt (US20020085037). The Applicants respectfully traverse the rejections.

Claims 1, 5-7, 9-13, 15-21, 23, and 25-28 have been amended for clarification. Support for the amendments can be found at least in paragraphs [0011] and [0022]-[0023] of the published application. No new matter is added.

The Applicants note that the specification has been amended to include section headers as per section 37 C.F.R. 1.77(c) of the MPEP. Further, it is noted that in the above AMENDMENTS TO CLAIMS section of this Response to Office Action a section header "CLAIMS" has been added above claim 1. The Applicants respectfully request that the Examiner allow these amendments to be entered.

Regarding the rejection of claim 1 the Applicants disagree with the Examiner.

First, it is noted that with regards to the Applicants arguments in the prior Response to Office Action filed on November 17, 2008, in the Response to Arguments section of the present Office Action, the Examiner states:

“In response to applicant’s arguments against the references individually, one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references. See *In re Keller*, 642 F.2d 413, 208 USPQ 871 (COPA 1981); *In re Merck & Co.*, 800 F.2d 1091, 231 USPQ 375 (Fed. Cir. 1986). Cheng-Hung clearly shows the ability to exchange files and was not provided to disclose the drag operation. The drag and drop operation is found in Astala.”

The Applicants disagree. The Applicants submit that the arguments presented in the prior Response to Office Action, but not addressed by the Examiner, are seen to have been based on the proposed combination in the rejection.

Further, it is noted that in the present Office Action the Examiner again states, starting on page 4 of the present Office action that:

“Astala does not specifically disclose the claimed aspect of “and shifting the second shortcut key operation with its attached content to the first shortcut key by performing one drag and drop operation from the first shortcut key to the second shortcut key”. However, Cheng-Hung discloses the claimed aspect of interchanging document files, wherein interchanging of document files among different systems can be feasible. (Cheng-Hung, US 6,397,232),” (emphasis added).

The Applicants disagree with the Examiner. It is noted that in the rejection that the Examiner appears to interpret at least claim 1 very broadly. Therefore, the Applicants have amended claim 1 for clarification that the content and functionality of the first shortcut key are shifted to become the content and functionality of the second shortcut key and to fully replace each other on the display. After drag-and-drop operation both shortcut keys may still exist but their content and functionality will have changed between each other.

Claim 1 as amended recites:

A method, comprising: shifting a first shortcut key with its attached content and functionality to become the content and functionality of a second shortcut key; and shifting the second shortcut key with its attached content and functionality to

become the content and functionality of the first shortcut key in one action on a display of an electronic apparatus by performing one drag and drop operation from the first shortcut key to the second shortcut key using a user interface of the electronic apparatus.

The Applicants argue that the proposed combination of Astala and Cheng-Hung, though not agreed to as proper, would still fail to disclose or suggest claim 1. Further, the Applicants contend that a person of ordinary skill in the art would not be motivated to combine the references cited, as proposed by the Examiner, for at least this reason.

The Applicants note that the rejection of claim 1 relies on a drag and drop operation of a file into a directory of Astala as illustrated in Figures 6b-6c. With regards to Figure 6 as cited, Astala discloses that "FIGS. 6a-6d illustrate a technique utilizing touch screen inputs for dragging and dropping objects displayed on the touch screen according to an example embodiment of the present invention," (col. 9, lines 3-6).

In addition, as similarly indicated in the prior Office Action, the Applicants note that the Examiner has still not provided any particular citation in Cheng-Hung to support where the rejection alleges that these admitted deficiencies of Astala, as stated above, are overcome by Cheng-Hung. After a thorough review of Cheng-Hung the Applicants can find only a mere reference in Cheng-Hung to an interchange. This reference is found where Cheng-Hung discloses, in reference to prior art, that:

"In a network environment, interconnection established among multiple data processing systems makes possible the electronic commerce and many business entities conduct their business behavior through the internet communication. Hence, how to communicate or interchange electronic document files between different data processing systems becomes more and more crucial," (emphasis added), (col. 1, lines 20-26).

Further, Cheng-Hung discloses:

“In the art, every data processing system can define a format for the content of its own document file in accordance with a standard format, so that interchanging of document files among different systems can be feasible,” (emphasis added), (col. 1, lines 27-31); and

“Because different data processing systems provide different standard formats of document files (order sheets for example) for electronic data exchange, a format translation upon the document file for exchanging is required so that the document file can be accepted by another data processing system,” (emphasis added), (col. 1, lines 41-46).

The Applicants submit that this “interchange” of Cheng-Hung, as referred to by the Examiner in the rejection, is seen to merely relate to **file format translation** of a document file to a standard format such that the document file will be accepted by another disparate data processing system which can utilize the standard format document.

Furthermore, the Applicants note that Cheng-Hung:

- **does not disclose that the document file (28) is retrieved** from the document database (22) of the first data processing system **and that the document is deleted** from the data base (22) during the retrieving operation;
- **does not disclose** that a saving of the received document file in the second data processing system **replaces another existing document file in the second data processing system**; and
- **does not disclose** that the saving of the received document file to the second data processing system generates **a document file transfer from the second data processing system to the first data processing system**.

Thus, the Applicants submit that for at least these reasons Cheng-Hung can not be applied, as in the rejection, to disclose or suggest **shifting a content and functionality** of a shortcut key to become the content and functionality of a different shortcut key and vice versa.

It is notable that the Examiner appears to admit the above-mentioned defects of Cheng-Hung by implication in the Office Action. This is seen to be the case where the Examiner states in the

Response to Arguments section of the Office Action that “This concept would be useful because it would allow both users or files in this case to have data that correlate to each other [and] This would be important when analyzing data or information by two or more parties.” The Applicants submit that this statement by the Examiner supports the Applicants contention that one and the same document file (28) of Cheng-Hung (even if in two different data formats) **exists in both** the first data processing system and the second data processing system at the same time and after forwarding the document file from the first data processing system to the second data processing system in Cheng-Hung. The Applicants submit that for at least this reason, Cheng-Hung can not be seen to overcome the admitted shortfalls of Astala as indicated in the rejection.

The Applicants contend that, for at least the reasons as stated above, Cheng-Hung can not be used to disclose or suggest at least where claim 1 relates to:

“shifting a first shortcut key with its attached content and functionality to become the content and functionality of a second shortcut key; and shifting the second shortcut key with its attached content and functionality to become the content and functionality of the first shortcut key in one action”

The Applicants submit that although Astala may be seen to relate to a drag and drop operation of a file into a directory, and Cheng-Hung may be seen to relate to exchanging a document with another system, where the file has been translated to be standardized so that it can be read by the other system, there can not be found anything in the references, alone or combined, that can be seen to relate to **shifting a content and functionality of a shortcut key to become the content and functionality of a different shortcut key** and vice versa.

The Applicants submit that, for at least the reasons stated, neither of Astala nor Cheng-Hung can be seen to relate to at least where claim 1 recites in part:

“shifting a first shortcut key with its attached content and functionality to become the content and functionality of a second shortcut key; and shifting the second shortcut key with its attached content and functionality to become the content and functionality of the first shortcut key in one action”

Further, the Applicants argue that even if this file format translation of Cheng-Hung were somehow incorporated into Astala the result would merely be the File 1 of Astala being translated into a standard format for a data processing system as in Cheng-Hung while the file is being dragged and dropped to DIR 2 of Astala.

Moreover, the Applicants contend that, for at least these reasons, a person of ordinary skill in the art would clearly not be motivated to combine Astala and Cheng-Hung as proposed by the Examiner.

The Applicants contend that, for at least these reasons, the rejection of claim 1 is improper and the rejection should be removed.

In addition, for at least the reason that independent claims 13, 19, and 23 recite features similar to claim 1, as stated above, the references cited can not be seen to disclose or suggest these claims. Thus, the rejection of all independent claims 1, 13, 19, and 23 should be removed.

With regards to the rejection of claim 12, the Applicants note that claim 12 has been amended to recite in part “wherein a shifted attached functionality comprises a functionality programmed into the electronic apparatus.” In the rejection of claim 12, as previously submitted, the Examiner indicates that “a function of a shortcut key” is disclosed or suggested by either of Astala or Hawkins. It is noted that claim 12 depends from claim 1. Thus, although the Applicants do not agree with the rejection, the Applicants submit that neither Astala nor Hawkins can be seen to disclose or suggest where claim 1 relates to **shifting a first shortcut key with its attached content and functionality** to become the content and functionality of a second shortcut key and vice versa. Thus, for at least the reason of its dependency, the rejection of claim 12 is seen to be overcome and the rejection should be removed.

Regarding the rejection of dependent claim 3, the applicants note that claim 3 has been rejected by utilizing the patent of Hawkins (US 6781575), which depicts a touch screen user interface

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including speed dialling buttons, with the two main documents. However, the Applicants submit that Hawkins can not be seen to relate to an interchange dialing buttons on the touch screen.

Regarding the rejection of dependent claims 8 – 11, the Applicant notes that in the rejection the Examiner cites Leavitt (US 2002/0085037), which includes a system where a mouse of a PC is utilized in re-arranging icons on a display. Further, it is noted that the Examiner has taken the mouse from this document and combined it with Astala and Cheng-Hung. However, the applicants submit that, in the system of Leavitt, the target icon whereto another icon should be dropped will be replaced with the dropped icon [paragraph 0131]. Therefore, in the system of Leavitt the target icon will be lost in the depicted drag-and-drop operation. The Applicants contend that for at least this reason the rejections of claims 8-11 are seen to be improper and the rejections should be removed.

As a summary, the Applicants contend that none of the references as cited, alone or combined, can be seen to disclose or suggest the claims.

Further, for at least the reasons that claims 2-12, 14-18, 20-22, and 24-29 are dependent upon independent claims 1, 13, 19 and 23, respectively, the rejections of these claims should be removed.


Based on the above explanations and arguments, it is clear that the references cited cannot be seen to disclose or suggest claims 1-29. The Examiner is respectfully requested to reconsider and remove the rejections of claims 1-29 and to allow all of the pending claims 1-29 as now presented for examination.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record. Should any unresolved issue remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

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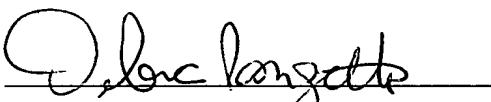
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